



west virginia department of environmental protection

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MEMORANDUM

To: Beverly D. McKeone, PE

From: Steven R. Pursley, PE *SAR*

Date: February 2, 2017

Subject: R13-0075I

On November 7, 2016, Appalachian Power Company (APC) requested an administrative update to permit R13-0075H. The request was to incorporate requirements to use the SCR and Flue Gas Desulfurization system on Unit 1. Making these requirements enforceable in a permit will, apparently, allow AEP to withdraw its request for a SIP amendment. APC made no request for any changes to any emission limits. Therefore, the following changes were made to the permit:

New conditions 4.1.1.1 through 4.1.1.3 were added. The applicant requested the condition I added as 4.1.1.3 be added as 2.1.4. However, since section 2 is boilerplate and the definition is only applicable to the SCR and FGD system, in the writers opinion, it made more sense to be included as 4.1.1.3. Additionally, the language proposed by the applicant didn't seem to make grammatical sense so it was tweaked slightly.

Additionally, while the permit was open, I removed antiquated emission limits from conditions 4.1.3 and 4.1.4 that only applied before January 31, 2016.